



file ACT/047/002
Norman H. Bangerter
Governor

Suzanne Dandoy, M.D., M.P.H.
Executive Director

September 26, 1986
538-6170

RECEIVED
OCT 03 1986

DIVISION OF
OIL, GAS & MINING

Mike A. Lekas, President
Geokinetics Inc.
391 Chipeta Way, D-2
Salt Lake City, Utah 84108-1202

Dear Mr. Lekas:

The Bureau of Solid and Hazardous Waste was recently notified by Tom Munson of the Division of Oil, Gas and Mining (DOGM) of Geokinetics' intent to close one of the existing evaporation ponds (Pond #1) at the Kamp Kerogen site. It is our understanding that the DOGM staff informed you that this matter had also been referred to our office to determine the applicability of waste disposal regulations.

In your letter of September 2, 1986 to John Whitehead of DOGM, you proposed to leave the accumulated oily sludge and ripped liner in place after the existing water evaporates. The pond will then be backfilled and the surface contoured and seeded to mitigate soil erosion.

The staff has reviewed your proposed closure procedures, the laboratory results of samples previously collected from ponds #1 and #2, and the applicable provisions of the Utah Solid Waste Disposal Regulations and Utah Hazardous Waste Management Regulations (UHWMR) and makes the following determinations:

- 1). The sludge is excluded from current hazardous waste regulations in accordance with paragraph 2.1.3.(b)(s) UHWMR which states that "... produced waters and other wastes associated with the exploration, development, or production of crude oil..." are solid wastes which are not hazardous wastes.
- 2). As solid wastes, the sludge and liner should be placed into an approved sanitary landfill (i.e. non-hazardous landfill).
- 3). Geokinetics has an approved on-site sanitary landfill. This landfill is near pond #1 and is in a similar hydrogeologic setting. The site itself is in a very remote location of Uintah County.
- 4). Allowing the sludge and liner to remain in place, as proposed, will not be any less protective of human health and the environment than by requiring these waste materials to be placed into the on-site landfill.

Therefore, based on the foregoing determinations, Geokinetics' proposed closure procedures for the sludge and liner from evaporation pond #1 are hereby approved. This approval, however, does not preclude Geokinetics from

meeting surface reclamation requirements of DOGM as well as other applicable standards or regulations not under the purview of this office. Also, Geokinetics is requested to submit written notification to the Bureau of Solid and Hazardous Waste within fifteen (15) days of completing the proposed closure of pond #1.

Should you have any questions, please contact Rusty Lundberg of my staff.

Sincerely,

for Dennis R. Lewis
Dale D. Parker, Ph.D.
Executive Secretary
Utah Solid and Hazardous Waste Committee

RL/psw
9365U

c: Uintah Basin District Health Dept.
Tom Munson, DOGM
Bureau of Water Pollution Control